

**Congress of the United States**  
**Washington, DC 20510**

May 16, 2022

Isobel Coleman  
Deputy Administrator  
United States Agency for International Development  
1300 Pennsylvania Avenue, NW  
Washington, DC 20004

Dear Deputy Administrator Coleman,

We write to express our concern and request information regarding developments stemming from recent U.S. Agency for International Development (USAID) anti-terror vetting changes for non-governmental organizations (NGO) partnership organizations.

In May 2020, USAID amended its “Standard Provisions for Non-U.S. Nongovernmental Organizations,” changing the anti-terror vetting process for subgrantees. Previously, USAID had required grantees looking to partner with additional organizations to implement USAID-funded projects to “consider all information about that individual or entity [with which it wants to partner] of which it is aware and all public information that is reasonably available to it or of which it should be aware,” when evaluating the candidate organization’s compatibility with US anti-terror regulations.

However, the standard introduced in May 2020 only demands that “the recipient will not engage in transactions with, or provide resources or support to, any individual or entity that is subject to sanctions administered by OFAC or the United Nations (UN).” By narrowing the scope of the due diligence required to provide taxpayer funds to a foreign NGO, this revision makes USAID grant funding vulnerable to engagement with partners that support, glorify, or excuse violence, terrorism or hate speech.

The language of the pre-2020 standard suggests a thorough review of the websites and social media accounts of potential partners was obligatory. Likewise, grantees were expected to scrutinize media reports and posts, court documents, and other public records relating to potential partners. However, the revised regulations appear to end these requirements, which are crucial to determining the compatibility and appropriateness of an organization receiving taxpayer funds.

As Congressional investigations have demonstrated<sup>1</sup>, consulting a broad array of publicly available sources often reveals crucial information about potential grantees that is not captured by OFAC or the UN. Likewise, though OFAC and the UN compile information about known

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<sup>1</sup> U.S. Senate. Committee on Finance. *World Vision Financial Transactions*. December 22, 2020.  
<https://www.finance.senate.gov/imo/media/doc/Oversight.%2012-23-20,%20Memo%20on%20World%20Vision%20Investigation.pdf>

terrorist entities, they cannot be expected to conduct lengthy, in-depth reviews of all potential USAID partners around the globe.

With these concerns in mind, we request that you provide the following information:

1. A detailed explanation of the rationale for the May 2020 anti-terror vetting change;
2. A response to the concerns raised regarding second-tier NGO partners that support, glorify, or excuse violence from receiving USAID funding; and
3. What steps, if any, USAID is currently planning or exploring to address these concerns.

Cooperation between USAID and grantees and their second-tier partners is a vital component to the implementation of international development aid and allows USAID to impactfully engage in humanitarian projects around the world. We look forward to your timely response to these concerns.

Sincerely,



Ken Buck  
Member of Congress



W. Gregory Steube  
Member of Congress



Josh Gottheimer  
Member of Congress



Doug Lamborn  
Member of Congress



Steve Chabot  
Member of Congress

CC: Samantha Power  
Administrator  
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